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VISTANA CONODOMINIUM OWNERS
ASSOCIATION, INC., a Nevada corporation

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

AMERICAN GENERAL LIFE INSURANCE
COMPANY,

Plaintiff,

v.

VISTANA CONDOMINIUM OWNERS
ASSOCIATION, PATRICIA ARNOTT AS
TRUSTEE OF THE NANCY QUON LIFE
INSURANCE TRUST DATED FEBRUARY
10, 2005 and DOES 1-10,

Defendants.

VISTANA CONDOMINIUM OWNERS
ASSOCIATION, INC.,

Counter-Plaintiff,

v.

AMERICAN LIFE INSURANCE
COMPANY; PATRICIA ARNOTT, as
TRUSTEE OF THE QUON LIFE
INSURANCE TRUST; ROES 301 through
310; STEPHANIE LINGLE AKA
STEPHANIE A. QUON; JESSICA QUON;
QUON PROPERTIES, LLC; and ROES 1
THROUGH 300;

Counter-Defendants.

CASE NO.: 2:12-CV-01324-GMN-CWH

~~PROPOSED~~ **PRIVACY ACT ORDER
COMPELLING THE PRODUCTION
OF DOCUMENTS AND PROTECTIVE
ORDER**

TO ALL INTERESTED PARTIES AND THEIR ATTORNEYS OF RECORD:

The Motion of VISTANA CONDOMINIUM OWNERS ASSOCIATION, INC. (“VISTANA”) to Compel Production and for Entry of a Privacy Act Order and Protective Order for GOOD CAUSE shown is hereby GRANTED.

IT IS HEREBY ORDERED that the Federal Bureau of Investigation (“FBI”) shall produce all documents in its possession, custody and control responsive to the Subpoena for Production of Documents served on the FBI by VISTANA on June 14, 2013, subject to the following Protective Order:

PROTECTIVE ORDER

1. Protected Documents (The term “Protective Documents” when used herein shall be defined herein as any discovery documents containing the personal identifying information such as social security numbers, drivers license numbers, dates of birth, bank account numbers, bank records, or addresses of participants, witnesses and victims in this case.) which will be used by the government in its case in chief include personal identifiers, including social security numbers, driver’s license numbers, dates of birth, bank account numbers, bank records, and addresses of participants, witnesses, and victims in this case.

2. Discovery in this case will be voluminous. Many of these documents include personal identifiers. Redacting the personal identifiers of participants, witnesses, and victims would prevent the timely disclosure of discovery to VISTANA.

3. The United States agrees to provide Protected Documents without redacting the personal identifiers of participants, witnesses, and victims.

4. Access to Protected Documents will be restricted to persons authorized by the Court, namely the defendants and counter-defendants to this action (collectively referred to herein as “defendants”), attorneys of record and attorneys’ paralegals, investigators, experts, and secretaries employed by the attorneys of record and performing on behalf of the defendants.

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1 5. The following restrictions will be placed on defendants, defendants' attorneys
2 and the above-designated individuals unless and until further ordered by the Court.
3 Defendants, defendants' attorneys and the above-designated individuals shall not:

4 a. make copies for, or allow copies of any kind to be made by any other person
5 of Protected Documents;

6 b. allow any other person to read Protected Documents; and

7 c. use Protected Documents for any other purpose other than preparing to defend
8 against the charges in the Indictment or any superseding indictment arising out of this case.

9 6. Defendants' attorneys shall inform any person to whom disclosure may be
10 made pursuant to this order of the existence and terms of this Court's order.

11 7. The requested restrictions shall not restrict the use or introduction as evidence
12 of discovery documents containing personal identifying information such as social security
13 numbers, driver's license numbers, dates of birth, and addresses during the trial of this
14 matter.

15 8. Upon conclusion of this action, defendants' attorneys shall return to
16 government counsel or destroy and certify to government counsel the destruction of all
17 discovery documents containing personal identifying information such as social security
18 numbers, drivers license numbers, dates of birth, and addresses within a reasonable time, not
19 to exceed thirty days after the last appeal is final.
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21 IT IS SO ORDERED this 10th day of July, 2013.

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24 UNITED STATES MAGISTRATE JUDGE
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